

1 **JENNY L. FOLEY, Ph.D., ESQ.**
Nevada Bar No. 9017
2 E-mail: jfoley@hkm.com
MARTA D. KURSHUMOVA, ESQ.
Nevada Bar No. 14728
3 E-mail: mkurshumova@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
4 1785 East Sahara, Suite 300
Las Vegas, Nevada 89104
5 Tel: (702) 625-3893
Fax: (702) 625-3893
6 *Attorneys for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 KEITH PAUL, an Individual,
9 Plaintiff,

10 vs.

11 CITY OF HENDERSON, DOES I -X; ROE
12 CORPORATIONS I -X,
13 Defendant.

CASE NO.: 2:19-cv-00996-GMN-DJA

STIPULATION AND ORDER FOR
PLAINTIFF TO FILE AN
AMENDED COMPLAINT

(Second Request)

14 IT IS HEREBY STIPULATED by and between the parties hereto through their
15 respective attorneys that Plaintiff Keith Paul may file a First Amended Complaint
16 revising the current causes of action. The filing of said First Amended Complaint would
17 resolve many of the issues discussed in Defendant City of Henderson's Motion to
18 Dismiss (Doc. No. 12).

19 1. On July 18, 2019, City of Henderson filed a Motion to Dismiss (Doc. No. 12).

20 Under the parties' Stipulation and Order to Extend Time to Answer or Otherwise
21 Respond to Complaint and to Establish Briefing Schedule (Doc. No. 7),
22 Plaintiff's Opposition to the Motion to Dismiss is due August 12, 2019 and the
23 City of Henderson's Reply is due August 26, 2019.
24

1 2. On July 30, 2019, Jenny L. Foley and Marta D. Kurshumova, counsel for
2 Plaintiff, conferred with Brian R. Reeve and Kristina Gilmore, counsel for
3 Defendant City of Henderson, regarding the timing of Plaintiff's Opposition and
4 the City of Henderson's Reply. Counsel for the parties agreed that:

- 5 a. Instead of filing an opposition to Defendant's Motion to Dismiss, Plaintiff
6 would file an amended complaint;
7 b. Said amended complaint would resolve many of the issues raised by
8 Defendant's Motion to Dismiss;
9 c. Plaintiff has until August 12, 2019, to file an amended complaint; and
10 d. Defendant City of Henderson will have until August 26, 2019 to answer
11 or otherwise respond to the First Amended Complaint.
12

13 3. On August 12, 2019, Jenny L. Foley and Marta D. Kurshumova, counsel for
14 Plaintiff, conferred with Brian R. Reeve, counsel for Defendant City of
15 Henderson, regarding the timing of Plaintiff's filing of an Amended Complaint
16 and the City of Henderson's Answer. Counsel for the parties agreed that:

- 17 a. Plaintiff has until August 26, 2019, to file an amended complaint; and
18 b. Defendant City of Henderson will have until September 16, 2019 to
19 answer or otherwise respond to the First Amended Complaint.
20

21 This document is being electronically filed through the Court's ECF System. In
22 this regard, counsel for Plaintiff hereby attests that (1) the content of this document is
23 acceptable to all persons required to sign the document; (2) Defendant's counsel has
24

1 concurred with the filing of this document; and (3) a record supporting this concurrence
2 is available for inspection or production if so ordered.

3 Dated: August 12, 2019

4 CITY OF HENDERSON

5
6 By: /s/ Brian Reeve

BRIAN R. REEVE (# 10197)

Assistant City Attorney

240 Water Street, MSC 144

Henderson, Nevada 89015

Telephone: (702) 267-1231

Facsimile: (702) 267-1201

Email:

brian.reeve@cityofhenderson.com

Attorney for Defendant

City of Henderson

11 Dated: August 12, 2019

HKM EMPLOYMENT ATTORNEYS LLP

13 By: /s/ Jenny Foley

Jenny L. Foley (#9017)

Marta D. Kurshumova (#14728)

1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

Telephone: (702) 625-3893

Facsimile: (702) 625-3895

Email: jfoley@hkm.com

Email: mkurshumova@hkm.com

Attorneys for Plaintiff

Keith Paul

18 **ORDER**

19
20 **IT IS SO ORDERED:**

21 Dated: August 13, 2019

23 

24 United States Magistrate Judge